

Representing Management Exclusively in Workplace Law and Related Litigation

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January 23, 2012

VIA FACSIMILE

Hon. Andrew J. Peck
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED
On Court, approved.
SO ORDERED.

RECEIVED
JAN 23 2012
CHAMBERS OF
ANDREW J. PECK

Hon. Andrew Jay Peck
United States Magistrate Judge

Re: **da Silva Moore, et al. v. Publicis Grope SA, et al.**
Case No. 11-CV-1279

Dear Judge Peck:

We represent the Defendant, MSLGroup Americas, Inc. ("MSL"). We are writing to request a two week extension to produce a sample of "Personnel Action Notices" ("PANs") and "Promotion Recommendation Forms" discussed at the Court conference held on January 4, 2012. Plaintiffs consent to this request.

By way of background, Plaintiffs contend the electronic data previously produced from MSL's human resources database might contain errors and want to review the PANS to verify whether the data is accurate. These forms, however, are not kept electronically and need to be manually pulled from a paper file for each employee. Additionally, files for terminated employees are stored off-site and must be located, delivered, reviewed, and copied. The Promotion Recommendation Forms, if they exist, must also be pulled from each file manually. Plaintiffs provided their proposed sample size for PANS on Friday January 20, 2012 and we are still waiting for confirmation from Plaintiffs regarding their proposed sample for the Promotion Recommendation Forms. As a result, Defendant will be unable to copy the PANS and produce the Promotion Recommendation Forms by January 25, 2012.

This is the first request for an extension of these deadlines. Thank you for your consideration of this matter.



Hon. Andrew J. Peck
United States Magistrate Judge
January 23, 2012
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Very truly yours,

JACKSON LEWIS LLP

A handwritten signature in black ink, appearing to read "Jeffrey W. Brecher". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeffrey W. Brecher

JWB/mf

Enclosures

cc: All counsel of record (via email)

ECF TRANSCRIPTION SHEET



ANDREW J. PECK
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT
Southern District of New York
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Dated: January 24, 2012

Total Number of Pages: 3

TRANSCRIPTION OF MEMO ENDORSED ORDER

On consent, approved.

Copies by ECF to: All Counsel
Judge Andrew L. Carter, Jr.